EGEG ROCKY FLATS

INTEROFFICE CORRESPONDENCE

DATE:

October 29, 1992

TO:

Distribution

FROM:

H. P. Mann, Deputy General Manager, Bldg. 111, X4361

SUBJECT:

REPORTING OF ENVIRONMENTAL DEFICIENCIES - HPM-059-92

Ref:

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R. M. Nelson, Jr. Itr (12365) to J. O. Zane, Environmental Compliance Reporting,

October 28, 1992

The above referenced letter (Attachment 1) from DOE, RFO requests that EG&G Rocky Flats, Inc. (EG&G) perform a comprehensive review of its operating practices in order to document any known or suspected deficiencies regarding any environmental statutes, regulations or agreements. The letter requests that EG&G respond with a list of known or suspected deficiencies by November 2, 1992. I am preparing a letter to DOE, RFO which requests an extension to November 9, 1992.

The response to this request requires a rapid and thorough compilation of your known or suspected environmental deficiencies. It is extremely important that we provide the customer with the most comprehensive list possible within the short period of time allowed by the extension.

The attached form (Attachment 2) is provided for you to document these deficiencies; additionally, a Macintosh Floppy Disk with the form template is being enclosed. The template has been prepared using System 7, WordPerfect 2.1. Document your known and suspected deficiencies using the enclosed disk. Also attached (Attachment 3) is a description of the meaning of the categories on the form. Your list must include information that currently exists on the Plantwide Action Tracking System (PATS), as well as those you are aware of that are not on PATS.

There are a number of expert sources on plantsite available to provide technical advice concerning interpretation of regulatory requirements. Attachment 4 provides the names and telephone extensions of individuals who can assist you.

The floppy disks with the information you collect must be returned to Dan Tallman, Waste Surveillance, T130C, by 4:00 PM, Wednesday, November 4, 1992.

If you have any questions, please call Allen Schubert at extension 5251.

ALS:cal

Attachments: As Stated (4)

8-19-93

EG&G ROCKY FLATS, INC. ROCKY FLATS PLANT, P. O. BOX 464, GOLDEN, COLORADO 80402-0464 (303) 966-7000

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2 1/2

Responsible Manager

Deficient with (Statute/ Regulation/Citation/ Agreement)

Deficiency Description

ENVIRONMENTAL DEFICIENCIES

1

Location of Deficiency Responsible (Bldg./Area/Room #) Organization

4.01

1. <u>Deficiency Description</u>

Describe the known or suspected deficiency in detail. For example, "Storing 150 55-gallon waste drums containing radioactively contaminated PCBs beyond the TSCA prescribed one-year storage limit".

If you believe the deficiency to be a "real one" rather than a potential deficiency, please place a capital letter "D" after your narrative deficiency description. If, on the other hand, you think the deficiency is a potential one, place a capital "PD" after your narrative deficiency description.

2. Deficient with (Statute/Regulation/Citation/Agreement)

Describe, in detail, the statute, regulation, citation or agreement that the known or suspected deficiency may be in non-compliance with. For example, in the example in 1., above, you would state, "Toxic Substance Control Act, 40 CFR 761.65(a)".

3. Location of Deficiency

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Describe, in detail, the building (and room number) or area where the known or suspected deficiency (or potential deficiency) exists. For example, in the example in 1., above, one would state, "Building 776, Room 237". If the deficiency involves an area, one would state, "Solar Ponds" or "PU&D Yard".

4. Responsible Organization

Identify the responsible organization at the Associate General Manager level. Generally, for facility deficiencies, such as RCRA tank systems' inadequate secondary containment, the response would be "Facility Management and Operations". For programmatic deficiencies, such as the lack of a required training program, the response would be, "Environmental and Waste Management".

5. Responsible Manager

Indicate the name of the manager who is ultimately responsible for correcting the known or suspected deficiency. The manager listed <u>must</u> be a Director or Operations Manager.

6. Final Completion Date

Indicate the date by which the known or suspected deficiency will be corrected. Do <u>not</u> provide interim completion dates for tasks that are part of the final corrective action date.

If funding has been provide in a FY93 work package to correct the known or suspected deficiency, please indicate this by placing a "Y" (yes) after the completion date. If funding has not been provided, please place a "N" (no) after the completion date.

RCRA/Colorado Hazardous Waste Regulations
Pam Edrich - X7752 Laurie Gregory-Frost - X5877 Dan Tallman - X5881
Solid Waste Act (Sanitary Landfill/Wastes)
Alan Church - X7825 John Ciucci - X5841
Toxic Substance Control Act (PCBs and Asbestos)
Bob Baker - X2698 Rick Bauma - X5565
Medical Waste
Alan Church - X7825 Dave Kidd - X5835
Interagency Agreement (CERCLA)
Tom Greengard - 273-6073 or X8510 Mike Arndt - X8569
Clean Water Act/FIFRA
Keith Motyl - X8602
Clean Air Act
Gary Magno - X8588
National Environmental Policy Act
Steve Nesta - X8605
RadNESHAPS
Bill Osborne - X8605
Emergency Planning and Community Right-to-Know Act
Dave Costain - X8528 Karen Like - 273-6009

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